

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
to Ensure Compatibility with)	
Enhanced 911 Emergency Calling Systems)	
)	

**Cellular XL Associates, L.P. – Amendment to Report on
Implementation of Wireless E911 Phase II
Automatic Location Identification**

Cellular XL Associates, L.P. ("Cellular XL") hereby submits an amendment to its report regarding implementation of wireless E911 Phase II Automatic Location Identification ("ALI").

I. Background/Contact Information

A. Carrier Identifying Information

Name: Cellular XL Associates, L.P.
TRS Number: 812377

B. Contact Information

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II. E911 Phase II Location Technology Information

A. Type of Technology

At the time it filed its original report, Cellular XL had not selected a solution for its Phase II Automatic Location Identification ("ALI") technology due to a lack of information available from switch and handset manufacturers to enable it to make an informed decision. Although Cellular XL still is not able to adequately compare

various Phase II solutions due to a continued lack of information from manufacturers, it is compelled at this time to select a solution nonetheless.

Accordingly, Cellular XL elects to utilize a network-based solution under Phase II of E911 implementation and is in the process of selecting a vendor for provision of this technology. Cellular XL had contacted several handset manufacturers to explore handset-based solutions, which were expected to be significantly less expensive than network-based solutions. The Commission has recognized that handset-based solutions seem to be well-suited to rural wireless markets, where Cellular XL primarily provides service. *See* E911 Third Report and Order, 14 FCC Rcd 17388, 17390-91 (1999).

However, Cellular XL has found no viable handset-based solution available. Accordingly, despite the significant drawbacks of using a network-based solution, including the extremely high cost of implementation of such a solution, Cellular XL feels that it has no other choice at this time but to select a network-based technology for provision of ALI, in light of the Commission's requirements and deadlines.

Cellular XL, however, has grave concerns regarding E911 Phase II implementation by rural wireless carriers in light of the fact that no handset-based solution appears to be available in the near future. It is with extreme reluctance that Cellular XL is selecting a network-based solution. Similarly-situated carriers have estimated that implementation of a network-based solution will cost approximately \$40,000 per base station. Given that Cellular XL has 65 base stations, at this price it would cost Cellular XL \$2.6 million to implement a network-based solution. This is an overwhelming figure considering that Cellular XL's entire capital budget for 2002 is not much more than \$2.6 million. Accordingly, Cellular XL is searching for a vendor who can provide a network-based solution at a price that won't jeopardize the financial stability of the company.

B. Testing and Verification

Cellular XL is in the process of identifying a vendor to provide a feasible network-based solution for its rural wireless markets. However, Cellular XL intends to comply with OET Bulletin No. 71 with respect to testing and verification methods used to gauge the accuracy of the ALI solution selected.

C. Implementation Details and Schedule

As stated above, Cellular XL is in the process of selecting a vendor to provide a network-based solution. Once such a vendor has been identified, Cellular XL will work with that vendor to determine a feasible implementation plan and schedule.

D. PSAP Interface

Cellular XL intends to implement the necessary hardware and software changes to timely deliver the Phase II information to a PSAP after receipt of a valid Phase II request. Currently, E911 Phase I procedures require Cellular XL to interface with BellSouth, and BellSouth, in turn, to interface with PSAPs. Accordingly, Cellular XL expects that it will send the Phase II information through an appropriate interface to BellSouth and that BellSouth will then send the Phase II information on to the PSAP.

E. Existing Handsets

Due to the fact that Cellular XL has selected a network-based solution at this time, it does not presently have an upgrade and/or replacement strategy for existing handsets.

F. Location of Non-Compatible Handsets

Because Cellular XL intends at this time to utilize a network-based solution to implement Phase II E911, it anticipates that existing customer handsets will be compatible with such a solution. Accordingly, it does not currently have plans to locate existing customer handsets for upgrading and/or replacement.

G. Other Information

At this time, Cellular XL has not received any PSAP requests for Phase II E911 implementation.

April 22, 2002